



"David Regonini"
<david.r@wt-us.com>
09/08/2008 09:24 AM

To: Carmen Santos/R9/USEPA/US@EPA
cc: <bgaintner@dstholdings.com>
bcc:
Subject: Re: Washington Park Corporate Center

Carmen, I hope you are feeling better. I've provided some of the information you asked for in this e-mail. I will prepare a separate written document for the contingency actions you have requested so you can add it to the amendment. The project is experiencing some concerning schedule delays, so anything you can do to move the amendment forward would be appreciated.

Original Notification - "PCB Remediation Notice, Washington Park Corporate Center, Lot 3, 44th Street and Washington Street, Phoenix, Arizona", WT Job No. 2187JK184, October 12, 2007.

Separate notices were submitted. Portions of Lot 3 were included in the second notice because they overlaid right-of-way area. Those parts of Lot 3 were either specified for removal in the previous notices, or were incorporated as part of the contingency to address PCBs in the right-of-way.

EPA Approval for the Lot 3 Notice - Dated November 2, 2007.

There have been no amendments so far. You are reviewing Amendment No. 1.

Amendment No. 1 addresses the capping and deed as you've indicated.

The amendment (p2) reads, "From November 2007 to May 2008, PCB clean-up was implemented on Lot 3 according to the PCB remediation Notice previously submitted to EPA." (referring to the October 12 Notice). We did not use the word additional. This is referring to the original implementation of the PCB clean-up work on Lot 3.

David Regonini
Western Technologies Inc.
3737 East Broadway Road
Phoenix, AZ 85040
602-437-3737 office
602-470-1341 fax
602-763-0231 cell

----- Original Message -----

From: <Santos.Carmen@epamail.epa.gov>
To: "David Regonini" <david.r@wt-us.com>
Sent: Thursday, September 04, 2008 5:40 PM
Subject: Re: Washington Park Corporate Center

> Greetings, David:
>
> Thank you for sending the contact information for use in EPA's letter. I
> appreciate it. I have the letter almost finished and would appreciate
> your help in providing certain information and clarifications that will
> help me complete the letter for internal review.
>
> Please provide the following information:
>

> Date and title of original notification that addresses the cleanup at
> Lot 3 and date of EPA's approval letter. I looked over the reports
> that you sent and it seems WTI submitted separate notifications for
> Phases 1 and 2 of the cleanup work. Phase 2 appears to include
> cleanup work on Lot 3.

> Please clarify the following in relation to the PCB work included in the
> July 22, 2008 amendment:

> The July 22, 2008 amendment is for capping of PCB contaminated area
> and preparation of deed.

> The July 22 amendment states that WTI conducted additional PCB
> cleanup work in Lot 3 from November 2007 to May 2008. Was this
> additional PCB cleanup work conducted under an amendment to the
> original notification or under the original notification.

> If PCBs are detected above 1 ppm in the planned detention basin
> areas, what steps will be taken to resolve this issue? The amendment
> does not include contingencies to address this issue.

> If PCBs above 10 ppm are found in soils at 20 feet below the surface
> of the identified contaminated area (grids T6-15, T7-15, and T8-15),
> what steps will be taken to resolve this issue?.

> I thank you for your patience. Please accept my apologies for not
> getting back to you sooner with the above issues. I have been ill and
> out of the office for a few weeks and this is my first day back. I tried
> calling you last week and possibly you were out for the long holiday
> weekend. I am trying to get the letter to my management as soon as
> possible and the above requested information and clarifications will be
> most helpful. Thank you.

> Sincerely,

> Carmen D. Santos, Project Manager
> RCRA Corrective Action Office
> Waste Management Division
> USEPA Region 9
> 415.972.3360
> fax: 415.947.3533

> *****

> "David Regonini"
> <david.r@wt-us.c
> om>

> 08/28/2008 08:43
> AM

To
Carmen Santos/R9/USEPA/US@EPA

cc
Subject
Washington Park Corporate Center

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>
>
> Carmen,
>
> Here is the contact information for the amendment letter. Any word on
> making it through reviews?
>
> AIG Retirement Services, Inc.
> In Care of DST Realty Advisors
> Attention: Douglas Tymins As Agent for AIG Retirement Services Inc.
> 6730 North Scottsdale Road, Suite 250
> Scottsdale, AZ 85253
>
> You can send it via e-mail to bgaintner@dstholdings.com
>
> Please also send a copy to me via e-mail.
>
> David Regonini
> Western Technologies Inc.
> 3737 East Broadway Road
> Phoenix, AZ 85040
> 602-437-3737 office
> 602-470-1341 fax
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